

## REMARKS

In the Office Action, the Examiner objected to the specification and rejected claims 1-28 under 35 USC §103(a). These objections and rejections are fully traversed below.

Claims 23 and 27 have been amended. Claims 1-28 remain pending. The specification has also been amended to improve its form. Reconsideration of the application is respectfully requested based on the following remarks.

### PATENTABILITY OF CLAIMS 1-28

In the Office Action, the Examiner objected to the specification because it lacked a summary of the invention. The specification has been amended to add a Summary section as requested by the Examiner. Therefore, it is respectfully requested that the Examiner withdraw the objection to the specification.

### PATENTABILITY OF CLAIMS 1-28

In the Office Action, the Examiner rejected claims 1-7, 11-16, 23-25 and 28 under 35 USC §103(a) as being unpatentable over King et al., U.S. Patent 6,011,554, in view of Williams, EP 1031913, and rejected claims 8-10, 17-22, 26 and 27 under 35 USC §103(a) as being unpatentable over King et al. in view of Williams and further in view of Timmins et al., U.S. Patent Publication US 2004/0096043. These rejections are fully traversed below.

Claim 1 pertains to a method that receives first data from a user representing alphanumeric information, and then predicts at least one additional item of alphanumeric information based upon the first data and a personal context model. The personal context model includes at least a personal language model and context markers that correlate to the personal language model.

In the Office Action, at pages 2-3, the Examiner rejected claim 1 as being unpatentable over King et al. in combination with Williams. In this regard, the Examiner references column 3, lines 24 through 30 of King et al. as corresponding to a personal context model. Applicants respectfully disagree. The discussion in King et al. at column 3, lines 24 through 30 merely describes a selection list in which a most commonly used word is presented at the top of the selection list, and then the user can press a select key to advance to a next most recently used word. Hence, the discussion of most commonly used words in King et al. is inadequate to reasonably teach or suggest a personal context model as recited in claim 1.

In this regard, claim 1 specifies that the personal context model “includes at least a personal language model and context markers that correlate to the personal language model.” Clearly, nothing in King et al. teaches or suggests any notion of a personal context model that includes not only a personal language model but also to context markers that correlate to the personal language model. On page 3 of the Office Action, the Examiner agreed that “King does not teach context markers that correlate to the personal language model.” However, the Examiner appears to rely on Williams to overcome this deficiency of King et al. Williams does discuss maintaining a user dictionary of words that have been entered. The user dictionary is provided as a cyclic buffer such that oldest words are deleted and new words are added when the buffer is full. Further, paragraph [0069] states: “A words creation date is reset each time it is used, so that even though a word was added to the dictionary long time ago, it will not be deleted if frequently used.” The predictive editor program receives ambiguous key inputs and operates to predict the word intended by the user using a language dependent dictionary and a user dictionary. The predictive editor program identifies those words in the dictionary that match the input key sequence. Hence, the words creation date is merely a tool to purge older user-defined words from the user dictionary, given the limited storage capacity for the user dictionary. Thus, the words creation date does not affect the prediction performed by the predictive editor program. Accordingly, like King et al., Williams also fails to teach or suggest any notion of a personal context model that includes not only a personal language model but also to context markers that correlate to the personal language model.

Therefore, it is submitted that claim 1 is patentably distinct from King et al., alone or in combination with Williams.

Claim 23 pertains to a method that, among other things, uses “the personal language model and context information to predict subsequent alphanumeric information when receiving input data representing alphanumeric information from the user.” Nothing in King et al. or Williams teaches or suggests use of a personal language model as well as context information to predict subsequent alphanumeric information as recited in claim 23. Accordingly, it is submitted that claim 23 is patentably distinct from King et al., alone or in combination with Williams.

Claim 28 pertains to a method that, among other things, makes use of a personal language model for a user to predict subsequent alphanumeric information when receiving input data representing alphanumeric information from the user. The prediction is based upon the input data and a personal context model, and the personal context model is user dependent and context sensitive. Nothing in King et al. or Williams teaches or suggests predicting subsequent alphanumeric information from input data supplied by a user together with a personal context

model that is user dependent and context sensitive. Therefore, it is submitted that claim 28 is patentably distinct from King et al., alone or in combination with Williams.

Claim 17 pertains to a method that provides a plurality of e-mail files for a user, and processes the plurality of e-mail files to develop a personal context model for the user. The processing includes developing a personal language model for the user based, at least in part, upon an analysis of alphanumeric information usage with respect to user context. Thereafter, the personal context model is used to predict subsequent alphanumeric information when receiving input data representing alphanumeric information from the user. On page 6 of the Office Action, the Examiner admits that “King/Williams does not teach the prediction is based upon previously analyzed alphanumeric information for the user as obtained from e-mail files for the user.” To overcome this deficiency, the Examiner combines Timmins et al. with King et al. and Williams. Timmins et al. pertains to a technique for assisting a user with information services at an information/call-center. The abstract indicates that “message overhead” data for an e-mail message can be obtained from external or internal databases such as the caller's contacts folders (also known as private directories) and user profiles. Initially, it is noted that the auto-completion type usage of databases to acquire message overhead data as described in Timmins et al. is not processing a plurality of e-mail files to develop a personal context model for the user. Hence, none of King et al., Williams or Timmins et al. teach or suggest processing a plurality of e-mail files to develop a personal context model for the user and then thereafter using the personal context model to predict subsequent alphanumeric information when receiving input data representing alphanumeric information from the user. Additionally, it is submitted that there is no motivation of record that would suggest to one of ordinary skill in the art that the information and assistance (auto-completion) provided by Timmins et al. could be used with the disambiguating system of King et al. or the predictive editor application of Williams. Therefore, it is submitted that claim 17 is patentably distinct from King et al., alone or in combination with Williams and/or Timmins et al.

Based on the foregoing, it is submitted that claims 1, 17, 23 and 28 are patentably distinct from King et al., alone or in combination with Williams and/or Timmins et al. In addition, it is submitted that dependent claims 2-16, 18-22 and 24-27 are also patentably distinct for at least the same reasons. The additional limitations recited in the independent claims or the dependent claims are not further discussed as the above-discussed limitations are clearly sufficient to distinguish the claimed invention from King et al., alone or in combination with Williams and/or Timmins et al. Thus, it is respectfully requested that the Examiner withdraw the rejection of claims 1-28 under 35 USC §103(a).

## **SUMMARY**

It is submitted that the specification is no longer objectionable. Furthermore, it is submitted that claims 1-28 are patentably distinct from the cited references. Reconsideration of the application and an early Notice of Allowance are earnestly solicited.

If there are any issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned attorney at the telephone number listed below.

Applicants hereby petition for an extension of time which may be required to maintain the pendency of this case, and any required fee for such extension or any further fee required in connection with the filing of this Amendment is to be charged to Deposit Account No. 50-0388.

Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,

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